
REMARKS

Claims 1-45 are currently pending in the subject application and are presently under consideration. Claims 1, 25, 41 and 43 have been amended as shown on pages 2-9 of the Reply. Claims 11 and 12 have been cancelled.

Additionally, applicants' representative thanks Examiner DiStefano and Examiner Hutton for the teleconference of May 22, 2007. The merits of the subject claims *vis-à-vis* the cited art were discussed. It was agreed that the proposed amendments to claim 1 overcome existing rejection based on Delorme (U.S. 4,972,319).

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1-6, 8, 10, 11, 14, 16, 17, 23, 25-31, 37, 38 and 41-43
Under 35 U.S.C. §102(e)

Claims 1-6, 8, 10, 11, 14, 16, 17, 23, 25-31, 37, 38 and 41-43 stand rejected under 35 U.S.C. §102(e) as being anticipated by Herigstad, *et al.* (US Patent 6,731,316) hereinafter Herigstad. Withdrawal of this rejection is requested since Herigstad fails to teach or suggest all aspects of subject claims.

A single prior art reference anticipates a patent claim only if it ***expressly or inherently describes each and every limitation*** set forth in the patent claim. *Trintec Industries, Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ***The identical invention must be shown in as complete detail as is contained in the ... claim.*** *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Applicants' claimed invention relates to system and method for navigating and browsing large information spaces on relatively small portable devices such as portable phones. Specifically, independent claim 1 and 25 recite *a key based input component which maps to one or more segments of content displayed on a portable device screen, the key-based input component comprising any number of numeric keys and non-numeric keys wherein a first key is tapped to zoom in at least a first zoom level to the*

corresponding segment of content and a number key is pressed and held for a period of time to temporarily display a different segment of content wherein upon releasing the second key the displayed content returns back to a previous segment of content to provide at least one of context and perspective with respect to the previous segment of content and displaying at surrounding segments to get at least one of context and perspective with respect to the previous segment of content, respectively. Herigstad neither teaches nor suggests such novel aspects.

Herigstad provides visual display of an electronic device partitioned into regions where each of regions is associated with a key on a keypad. The keys are associated with the regions such that when a key is selected, the selected option associated with the region is chosen. Hence Herigstad only provides navigating through large content by partitioning the content into distinct regions and associating each of the regions with a key on a keypad and neither teaches nor suggests the aforementioned claimed features of applicants' invention.

In view of at least the foregoing, it is clear that Herigstad fails to teach each and every aspect recited in amended claims 1, 25, 41 and 43. Therefore, it is respectfully requested that this rejection be withdrawn.

II. Rejection of Claims 7, 9 and 40 Under 35 U.S.C. §103(a)

Claims 7, 9 and 40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Ericsson (US Patent 6,130,665). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Herigstad and Ericsson either alone or in combination do not teach or suggest all aspects set forth in the subject claims. In particular, Ericsson relates to a data input device including a touch screen and does not make up for the aforementioned deficiencies of Herigstad with respect to amended independent claim 1 and 25 (which claims 7, 9 and 40 depend from). Thus, the subject invention as recited in the claims 7, 9 and 40 is not obvious over the combination of Herigstad and Ericsson. Accordingly, it is respectfully submitted that this rejection should be withdrawn.

III. Rejection of Claims 12, 13, 15 and 32-36 Under 35 U.S.C. §103(a)

Claims 12, 13, 15 and 32-36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Delorme (US Patent 4,972,319). Withdrawal of this rejection is requested for at least the following reasons. Herigstad and Delorme either alone or in combination, fail to teach or suggest all features of the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must be found in the prior art and not based on the applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (emphasis added).

Applicant's claimed invention relates to system and method for navigating and browsing large information spaces on relatively small portable devices such as portable phones. Specifically, independent claim 1 and 25 recite a key based input component which maps to one or more segments of content displayed on a portable device screen, the key-based input component comprising any number of numeric keys and non-numeric keys *wherein a first key is tapped to zoom in at least a first zoom level to the corresponding segment of content and a second key is pressed and held for a period of time to temporarily display a different segment of content where upon releasing the second key the display returns back to a previous segment of content to provide at least one of context and perspective with respect to the previous segment of content and quickly glancing at surrounding segments to get at least one of context and perspective with respect to the previous segment of content, respectively.* Herigstad and Delorme are both silent regarding such novel aspects of the claimed invention.

As stated *supra*, Herigstad fails to teach or suggest the claimed invention. The secondary reference Delorme, given by Examiner, relates to a global mapping system which organizes mapping data into a hierarchy of successive levels for presentation of mapping data with variable resolution, starting from a lower resolution and progressing to higher resolution. The hierarchical structure can be linked to a pyramid which has various numbers of tiles at each level. The first level of the pyramid contains 4 tiles, the second level contains 16 tiles, third contains 64 tiles and so on. Digital data corresponding to each of the separate data base tiles is stored in the database under a unique file name; and this reference does not teach the claimed invention.

At page 11 of the Final Office Action, the Examiner incorrectly contends that Delorme teaches that *a second number key is pressed and held for a period of time to temporarily display a different segment of content where upon releasing the second number key the display returns to a previous segment of content to provide at least one of context and perspective with respect to the previous segment of content*, with respect to dependent claim 12. The cited document provides scrolling or flying to different lateral “relative viewing positions” to display a different lateral portion of the map. Instead of adding or removing file name characters as in a change of resolution, the mapping system is programmed to keep track of the filenames of the current position also, and the orderly arrangement of filenames so that the appropriate filenames corresponding to the desired lateral portion are determined. As an example, if the user desired to scroll to the right border of the paper, the mapping system would respond by accessing and causing the monitor to display the digital maps corresponding to files associated with right border of the paper, then if user desired to scroll to bottom of the paper, the mapping system would respond by accessing and causing the monitor to display the digital maps corresponding to bottom of the paper. All the files above correspond to same level of resolution (Column 13, lines 23-53). Hence Delorme provide for viewing of lateral portions of the map and at the same resolution corresponding to the previous portion of the map. However Delorme does not teach pressing a second key and *holding for a period of time to temporarily display* a different segment of content *where upon releasing the second number key snaps back to a previous segment of content to provide at least one of context and perspective with*

respect to the previous segment of content. Delorme provides for viewing of different lateral portions of the map corresponding to a given portion of the map and displaying *permanent display* of different lateral portion of the map. Hence it is difficult to the user to get *context and perspective of surrounding segments with respect to the previous segment of content.* According to the Delorme if the user wants to see surrounding segments of a given segment of the map to get *context and perspective with respect to the given segment of content*, then the user can scroll to first right segment and can see right segment of the given segment of the map. But then *the user needs to scroll again to previous segment to get context and perspective with respect to the previous segment of content.* Then if user wants to see bottom segment of the map corresponding to a given segment, he needs to scroll down and then *he needs to again scroll up* for relative viewing position. Hence the *user has to scroll so many times and the process takes too much time* and even after multiple scrolling, it is difficult for the user to get exact *context and perspective of surrounding segments with respect to the previous segment of content.*

The present invention provides for a *second number key* which *if pressed and held for a period of time to temporarily display a different segment of content where upon releasing the second number key snaps back to a previous segment of content to provide at least one of context and perspective with respect to the previous segment of content.* So the user can easily get *context and perspective of surrounding segments with respect to the previous segment of content* by pressing and holding different keys. Hence the invention facilitates *quickly glancing* at an alternate view with respect to the current view and the user can readily and easily gain an overview of the graphical content and compare information from different spatial regions of the content. In quick succession, the user can build up a mental model of how different parts of the data-set are related by quickly glancing at different sections of the data-set. This can be helpful when interesting data extends beyond the currently viewed region (display screen) and when the user wants to *quickly compare data from sections of the data-set that are not both viewable, in detail, at the same time.*

In view of at least the foregoing, it is readily apparent that both Herigstad and Delorme fail to teach or suggest all aspects of the claimed invention. Accordingly, it is respectfully requested that this rejection of claims 12, 13, 15 and 32-36 should be

withdrawn.

IV. Rejection of Claims 18 and 19 Under 35 U.S.C. §103(a)

Claims 18 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hiroshi *et al.* (Japanese Patent 07-270172) hereinafter Hiroshi. It is respectfully requested that this rejection be withdrawn for at least the following reasons. Hiroshi does not teach or suggest all aspects set forth in the subject claims, with respect to amended independent claim 1 (which claims 18 and 19 depend from). Thus, the subject invention as recited in the claims 18 and 19 is not obvious over Hiroshi. Accordingly, it is respectfully submitted that this rejection should be withdrawn.

V. Rejection of Claim 20 Under 35 U.S.C. §103(a)

Claim 20 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Hiroshi in further view of Nimura *et al.* (US Patent 6,202,026). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Herigstad, Hiroshi and Nimura *et al.* either alone or in combination do not teach or suggest all aspects set forth in the subject claims. In particular, Nimura *et al.* relates to a map display device and a recording medium for a vehicle navigation and does not make up for the aforementioned deficiencies of Herigstad and Hiroshi with respect to amended independent claim 1 (which claim 20 depends from). Thus, the subject invention as recited in the claim 20 is not obvious over the combination of Herigstad, Hiroshi and Nimura *et al.* Accordingly, it is respectfully submitted that this rejection should be withdrawn.

VI. Rejection of Claims 21 and 22 Under 35 U.S.C. §103(a)

Claims 21 and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Sato (US Patent 5,906,654). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Herigstad and Sato either alone or in combination do not teach or suggest all aspects set forth in the subject claims. In particular, Sato relates to route guidance for vehicle navigation apparatus to find alternate destination and does not make up for the aforementioned deficiencies of

Herigstad with respect to amended independent claim 1 (which claims 21 and 22 depend from). Thus, the subject invention as recited in the claims 21 and 22 is not obvious over the combination of Herigstad and Sato. Accordingly, it is respectfully submitted that this rejection should be withdrawn.

VII. Rejection of Claims 24 Under 35 U.S.C. §103(a)

Claim 24 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad. It is respectfully requested that this rejection be withdrawn for at least the following reasons. Herigstad do not teach or suggest all aspects set forth in the subject claims. In particular, Herigstad relates to graphical layout and keypad response to visually depict and implement device functionality for interactivity with a numbered keypad and does not make up for the aforementioned deficiencies with respect to amended independent claim 1 (which claim 24 depends from). Thus, the subject invention as recited in the claim 24 is not obvious over Herigstad. Accordingly, it is respectfully submitted that this rejection should be withdrawn.

VIII. Rejection of Claims 39 Under 35 U.S.C. §103(a)

Claim 39 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Nishiyama (US Publication No. 2003/0038787). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Herigstad and Nishiyama either alone or in combination do not teach or suggest all aspects set forth in the subject claims. In particular, Nishiyama relates to method of using ten-key keypad and does not make up for the aforementioned deficiencies of Herigstad with respect to amended independent claim 25 (which claim 39 depends from). Thus, the subject invention as recited in the claim 39 is not obvious over the combination of Herigstad and Nishiyama. Accordingly, it is respectfully submitted that this rejection should be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP630US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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